

0023105

CORRES. CONTROL
OUTGOING LTR. NO.Rocky Flats Plant
North American Space Operations
Rockwell International Corporation
P.O. Box 464
Golden, Colorado 80402-0464
(303) 966-7000Rockwell
International

000025414

Contractor to U.S. Department of Energy

June 26, 1989

WS-LT-02087
89-RF-2190E. S. Goldberg
Acting Area Manager
DOE, RFAO

Attention: C. C. Jierree

MONTHLY MONITORING REPORT - NPDES PERMIT NO. CO-0001333

Enclosed is a letter which is required by the Rocky Flats NPDES Permit program. The EPA has determined that it is no longer necessary to send blank forms when no discharge has occurred. There was no discharge from Pond B-3 (discharge 001) during the month of May, 1989. Attached is the Discharge Monitoring Report (DMR) for the discharge of Pond A-3 (discharge 002) during the month of May, 1989.

There are three issues that have transpired during the recent and on-going Justice Department investigations and in the course of resolution of disputed issues regarding the EPA's proposed NPDES Federal Facilities Compliance Agreement (FFCA). One of the issues raised during the Justice Department investigations involves the flow of seeps from the hillside below the spray irrigation fields into the Woman Creek drainage. Field surveys indicate the seeps originate from ground water probably recharged from spray irrigation activities. This flow may be considered a nonpoint source discharge and therefore does not require a point source discharge permit. The second issue raised during the Justice Department investigation involves additional nonpoint source discharges from the domestic wastewater treatment systems at the (outer) east and west guard posts.

The third issue to be resolved by discussions between DOE and the EPA regards the statement by EPA in the Proposed NPDES Federal Facilities Compliance Agreement (FFCA), Docket Number FFCA-CWA-89-2, paragraph 3, page 2 referencing the chromic acid incident as a violation of the NPDES permit. There are a number of discrepancies between the allegation made by the EPA regarding designation of the chromic acid incident as a violation of the NPDES permit and the authorization to discharge provided by the EPA in the letter from EPA's Max Dodson to

ADMIN RECCRD

SW-A-002905

9 RF 2190

DIST.	LTR	ENCL
NCHINI, D.J.		
DER, C.P.		
FURDT, R.J.	X	X
INTZ, E.R.		
OD, R.C.		
KER, E.H.		
ZER, J.E.		
BY, W.A.		
NETT, J.F.		
YERS, G.W.		
ECKER, J.H.		
ANNON, W.M.		
ESTON, W.F.		
OZNIAK, B.D.		
UNG, E.R.		

CHER, D.H.		
ARNIVAL, G.J.		
RRERA, D.W.		
ARMAN, L.K.		
EBERT, J.L.		
KEY, J.B.		
OFFMAN, S.B.		
AMANN, R.L.		
RIEG, D.M.		
UDENBURG, G.E.		
CKINLEY, K.B.		
AIMON, E.R.		
EWBY, R.L.		
JRNER, H.L.		
ELASQUEZ, R.N.		

CORRES. CONTROL	X	X
CONTRACT ADMIN.		

Dixon	X	X
Hobbs	X	X
Setlock	X	X
Sundblad	X	X

CLASSIFICATION		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTH. CLASSIFIER SIG.
Anne K. Clavin
6-26-89

IN REPLY TO LTR. NO.

EC: J. J. DMR

R APPROVALS
-HSRIG & TYPIST INITIALS
-46409 (Rev. 4/89)

E. S. Goldberg
Page 2
June 26, 1989

89-RF-2190

Albert Whiteman, ref. 8WM-C. For example, the FFCA states that "DOE does not have approval to dispose of chromic acid through outfalls 001, 006, 007, or the Upper Church Ditch." The letter providing approval to discharge Pond B-5 to the Upper Church Ditch, referenced above, sets limits on that discharge for any single sample of 0.05 mg/l total chromium. In addition, there was no discharge through outfall 001 (Pond B-3). The water was spray irrigated during this time period. The water in Pond C-2 (discharge 007) was 24-hour composite sampled during the discharge in April, 1989. The total chromium analyses ranged from <0.01 mg/l to 0.012 mg/l over the six-day discharge period. The pond system is included in the currently approved (by EPA) Spill Prevention, Control, and Countermeasures/ Best Management Practices Plan (SPCC/BMP) as designated spill control holding ponds (page 27 "Holding Ponds"). It is Rockwell's view that the chromic acid that was accidentally released to the environment was held as designated in the SPCC/BMP plan until natural biological treatment in the holding ponds provided for a release to the "Waters of the U. S." that met applicable federal and state water quality standards.

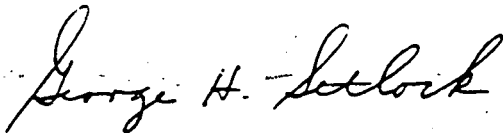
It is necessary that the Principal Executive Officer sign and date the letter and the information be sent to the following people by June 28, 1989.

Mr. Pat Godsil, Chief
Compliance Branch
Water Management Division
U. S. Environmental Protection Agency, Region VIII
One Denver Place
999 - 18th Street, Suite 500
Denver, CO 80202-2413

E. S. Goldberg
Page 3
June 26, 1989

89-RF-2190

Colorado Department of Health
Attention: Stanley V. May
Monitoring and Enforcement Section
Water Quality Division
4210 East Eleventh Avenue
Denver, CO 80220

A handwritten signature in cursive script, reading "George H. Setlock".

G. H. Setlock, Manager
Environment and Health Programs

Orig. and 1 cc: E. S. Goldberg
Enc.

DRAFT DRAFT DRAFT

Mr. Pat Godsil, Chief
Compliance Branch
Water Management Division
U. S. Environmental Protection Agency, Region VIII
One Denver Place
999 - 18th Street, Suite 500
Denver, CO 80202-2413

Colorado Department of Health
Attention: Stanley V. May
Monitoring and Enforcement Section
Water Quality Division
4210 East Eleventh Avenue
Denver, CO 80220

This letter constitutes the monthly report as required by Rocky Flats NPDES Permit CO-0001333. There were no violations of the NPDES Permit during May, 1989.

During the month of May water was spray irrigated from Pond B-3. Pond A-3 (Discharge 002) was discharged May 23, 1989 through May 26, 1989. The Reverse Osmosis Pilot Plant (Discharge 003) was not operated. The Reverse Osmosis Plant (Discharge 004) did not discharge to offsite waters. Pond B-5 discharge to the Upper Church Ditch was initiated on April 24, 1989. Total discharge from Pond B-5 to the Upper Church Ditch through May 26, 1989 was 14,765,815 gallons.

The water quality information for the discharge of Pond B-5 to the Upper Church Ditch was submitted to you recently as required.

PERMITTEE NAME/ADDRESS (Include

Facility Name/Location if different)

NAME **USDGE-ROCKY FLATS PLANT**

ADDRESS **P O BOX 928**

GOLDEN

CU 80401

FACILITY

LOCATION

ATTN: **JAMES R NICKS, AREA MANAGER**

NATIONAL POLLUTANT DISCHARGE ELIMINATION ACT (CERCLA)

DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

CU0001333

PERMIT NUMBER

002 A

DISCHARGE NUMBER

F - FINAL

DISCHARGE FROM POND A-3

MONITORING PERIOD

FROM			TO		
YEAR	MO	DAY	YEAR	MO	DAY
89	05	01	89	05	31
(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)

MAJOR

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
PII	SAMPLE MEASUREMENT	*****	*****		7.0	*****	7.6	0	4/30	GRAB
00400 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	****	6.0 MINIMUM	*****	9.0 MAXIMUM			DAILY GRAB
NITROGEN, NITRATE TOTAL (AS N)	SAMPLE MEASUREMENT	*****	*****		*****	4.16	4.29	0	4/30	
00620 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	****	*****	10 30 DA AV	20 DAILY MX			DAILY GRAB
FLOW, IN CONDUIT OR THRU TREATMENT PLANT	SAMPLE MEASUREMENT	2.093	2.462		*****	*****	*****	0	4/30	INS
50050 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	REPORT 30 DA AV	REPORT DAILY MX	MGD	*****	*****	*****			DAILY INSTA
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 USC § 1001 AND 33 USC § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	TELEPHONE		DATE		
		AREA CODE	NUMBER	YEAR	MO	DAY
TYPED OR PRINTED	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT					

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

IF NO DISCHARGE, RPT "NO DISCHARGE". MONITORING REQ'D ONLY WHEN THERE IS A DISCHARGE OR BYPASS-SEE PERMIT. THERE SHALL BE NO DISCHRG OF FLOATING SOLIDS IN OTHER THAN TRACE AMTS. COMPOSITE SAMPLING FOR

THIS FORM IS ALLOWED FOR PREVIOUS EDITION TO BE USED UNTIL SUPPLY IS EXHAUSTED.

(REPLACES EPA FORM T-40 WHICH MAY NOT BE USED.)

00044/051388-1539

PAGE 1 OF